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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
TERRESTAR CORPORATION, <i>et al.</i> , ¹)	Case No. 11-10612 (SHL)
)	
Debtors.)	Jointly Administered
_____)	
ALSO ISMAEL PEREZ,)	
)	
Plaintiff,)	Adv. Proc. No. 13-01334 (SHL)
)	
v.)	
)	
TERRESTAR CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal taxpayer-identification number, are: (a) TerreStar Corporation [6127] and TerreStar Holdings Inc. [0778] (collectively, the "**February Debtors**"); and (b) TerreStar New York Inc. [6394]; Motient Communications Inc. [3833]; Motient Holdings Inc. [6634]; Motient License Inc. [2431]; Motient Services Inc. [5106]; Motient Ventures Holding Inc. [6191]; and MVH Holdings Inc. [9756] (collectively, the "**Other TSC Debtors**" and, collectively with the February Debtors, the "**Reorganized TSC Debtors**").

**APPELLEES' COUNTER DESIGNATION OF
ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

The documents filed by Aldo I. Perez on February 18, 2016 [Docket No. 49] (the “*Perez Designation*”) fail to clearly state the issues to be presented on appeal. In addition, the Perez Designation fails to properly list the document titles and docket numbers to be designated in the record on appeal. As a courtesy to the Court, and to provide clarity to all parties in interest, Appellees, the Reorganized TSC Debtors, have reviewed the Perez Designation and the accompanying documents in an attempt to determine the issues to be presented on appeal by Mr. Perez. Upon information and belief, Mr. Perez seeks to appeal (1) an order dated September 29, 2015 [Docket No. 40], whereby this Court granted the TSC Debtors’ motion to dismiss Mr. Perez’s complaint seeking to revoke this Court’s Order confirming the Debtors’ plan of reorganization on the basis that the order was procured by fraud in violation of 11 U.S.C. § 1144 (the “*Motion to Dismiss Order*”), and (2) an order dated January 15, 2016 [Docket No. 45] denying Mr. Perez’s motion for reconsideration of the Motion to Dismiss Order.

Appellees, by their undersigned attorneys, hereby designate the following additional items to be included in the record on appeal pursuant to Federal Rule of Bankruptcy Procedure 8006. To the extent that Mr. Perez challenges additional orders entered by this Court, Appellees reserve the right the supplement these designations.

Adversary Proceeding No. 13-01334 (SHL)		
Filing Date	Docket #	Docket Text
04/23/2013	1	Complaint
07/01/2013	9	The TSC Debtors’ Motion to Dismiss Adversary Complaint
07/01/2013	10	Declaration of Douglas Brandon in Support of the TSC Debtors' Motion to Dismiss Adversary Complaint

Adversary Proceeding No. 13-01334 (SHL)		
Filing Date	Docket #	Docket Text
08/05/2013	12	Transcript regarding Hearing Held on 7/31/13 RE: Motion to Dismiss Adversary Proceeding
08/15/2013	13	Amended Complaint against Aldo Ismael Perez to Revoke Order of Confirmation
08/20/2013	14	Motion for Attachment Motion for Leave to File Second Amended Complaint
08/21/2013	15	Amended Complaint against TerreStar Corporation Second Amended Complaint to Revoke Order of Confirmation
09/19/2013	16	Amended Complaint against Aldo Ismael Perez Notice of Filing Documents In Support of Certain Claims Made In Second Amended Complaint
09/20/2013	17	Statement Plaintiff, Aldo Ismael Perez's Notice of Discovery of Material and Critical Facts Relating to the 'Fabricated' Venue Issue Raised in Second Amended Complaint to Revoke Order of Confirmation
05/05/2014	18	Amended Complaint against Aldo Ismael Perez Unopposed Supplemental Motion for Leave to File Second Amended Complaint
08/07/2014	21	Motion to Dismiss Adversary Proceeding The TSC Debtors' Motion to Dismiss the Second Amended Adversary Complaint
08/07/2014	22	Declaration of Douglas Brandon in Support of the TSC Debtors' Motion to Dismiss the Second Amended Adversary Complaint
10/08/2014	24	Notice to Take Depositions of Douglas Brandon
10/12/2014	25	Motion to Compel Or, Alternatively, For Continuance
10/17/2014	27	Order Signed On 10/17/2014, Denying Request For Continuance
10/23/2014	28	Response to Motion <i>to Dismiss</i>
10/28/2014	32	Reply to Motion The TSC Debtors' Reply Memorandum of Law in Support of Motion to Dismiss the Second Amended Adversary Complaint
10/28/2014	33	Declaration of Joseph L. Sorkin in Support of the TSC Debtors' Reply Memorandum of Law in Support of Motion to Dismiss the Second Amended Adversary Complaint

Adversary Proceeding No. 13-01334 (SHL)		
Filing Date	Docket #	Docket Text
02/24/2015	34	Transcript regarding Hearing Held on 10/29/2014 2:24PM RE: Motion To Dismiss Adversary Proceeding The TSC Debtors' Motion to Dismiss The Second Amended Adversary Complaint; Response to Motion
07/29/2015	38	Memorandum Endorsed Order Signed On 7/29/2015. "The Court has not sought any additional information regarding the pending motion to dismiss...." Re: Letter Filed By Aldo Perez Dated June 18, 2015
09/29/2015	40	Memorandum Of Decision Signed On 9/29/2015, Re: Plaintiff's Motion To File A Second Amended Complaint And Debtor's Motion To Dismiss Case
10/13/2015	41	Motion to Reconsider Dismissal of Case / Memorandum of Law in Support of Plaintiff's Motion for Reconsideration of Memorandum Decision and Order Dismissing the Debtors' Motion to Dismiss the Second Amended Complaint (ECF No. 18-30) (the "Complaint") of the Plaintiff. Aldo Ismael Perex, in the above captioned Adversary Proceeding. Pursuant to Section 1144 of the Bankruptcy Code, the Complaint seeks to Revoke the Court's Order Confirming the Debtors' Plan of Reorganization on the basis that the order was procured by Fraud. The Officer's of this Court are playing a Revised Legal Game with their own created rules and the is fraud upon the Court
01/15/2016	45	Memorandum Of Decision And Order Signed On 1/15/2016, Denying Aldo Ismael Perez's Motion For Reconsideration

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
7/22/2011	141	Joint Chapter 11 Plan of Terrestar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., Terrestar Holdings Inc. and Terrestar New York Inc.

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
8/3/2011	149	Disclosure Statement for the Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holdings Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
8/3/2011	150	Motion for Entry of an Order (A) Approving the Disclosure Statement for the Joint Chapter 11 Plan of the TSC Debtors and (B) Establishing Solicitation and Voting Procedures with Respect to the Joint Chapter 11 Plan of the TSC Debtors
8/5/2011	152	Statement/Notice of Filing of Exhibits to the Disclosure Statement for the Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
08/09/2011	154	Letter regarding the recent announcement regarding the debtor's stock as being worthless to it[s] shareholders
8/9/2011	157	Letter Asking that an Independent Auditor Be Appointed in This Case filed by Aldo I. Perez.
08/19/2011	168	Letter to the Honorable Sean H. Lane Re: Appoint an unbiased equity committee to represent the common share holders
8/29/2011	179	Objection to Motion filed by Jeffrey M. Swarts.
09/09/2011	196	Objection To TSC Debtors' Disclosure Statement
9/14/2011	200	Examiner's Report /Examiner Request Supplemental Documents filed by Jeffrey M. Swarts
9/15/2011	201	Objection of the TSC Debtors to the Request for Appointment of an Examiner
9/15/2011	203	Motion to Join Reconsideration Request of Jeffrey M. Swarts for an Examiner
9/15/2011	204	Letter Supplemental Documents Relating to the Objection of the TSC Debtors to the Request for Appointment of an Examiner
9/15/2011	207	(DOCUMENT FILED INCORRECTLY, SEE DOCUMENT 216 FOR CORRECT ENTRY) Objection to Motion

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
9/20/2011	213	Transcript regarding Hearing Held on 09/19/2011 10:16 AM RE: (A) Motion for Entry of an Ex Parte Bridge Order; and (B) Third Motion for an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptance Thereof; Valuation Objections of Jeffrey M. Swarts in Response to the TSC Debtors' First Plan of Reorganization, Disclosures Exhibits D & F and Reconsideration Request for an Examiner Under Section 1104(c) and/or Official Equity Committee Under Section 1102(a)(2).
9/15/2011	216	Objection to Motion (related document(s)150) filed by Aldo I. Perez.
9/23/2011	217	Order Signed on 9/23/2011, Denying Requests for Appointment of an Examiner for the TSC Debtors.
10/11/2011	232	Motion to Appoint Examiner Motion of Aldo I. Perez for Reconsideration of Order Denying Motion to Appoint Examiner
10/21/2011	246	Transcript regarding Hearing Held on 09/21/2011 3:06 PM RE: Telephone Conference on the Record: Decision Re: Doc #190 & 179 Scheduling Order Signed on 9/7/11, Re: Valuation Objections of Jeffrey Swarts in Response to the TSC Debtors First Plan of Reorganization Disclosures Exhibits D & F and Reconsideration Request for an Examiner and /or Official Equity Committee.
11/4/2011	253	Objection to Motion TSC Debtors' Objection to Motion of Aldo I. Perez for Reconsideration of Order Denying Motion to Appoint Examiner
11/14/2011	264	Response Reply to Response to Reconsider Order Denying Appointment of Examiner (related document(s)232) filed by Nelson C. Bellido on behalf of Aldo I. Perez.
11/15/2011	271	Affidavit of Service of the Reply to Response to Motion to Reconsider Order Denying Appointment of Examiner
11/15/2011	272	Motion to Join Examiner Motion of Aldo Perez filed by Jeffrey M. Swarts.

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
11/17/2011	287	Transcript regarding hearing held on 11/16/2011 10:16 AM RE: Motion to Appoint Examiner Motion of Aldo I. Perez for Reconsideration of Order Denying Motion to Appoint Examiner Doc #187 Second Motion for Omnibus Objection to Claim(s) TSC Debtors Second Omnibus Objection to Certain Proofs of Claim (Amended and Superseded, Noncompliant, Fully Satisfied, Partially Satisfied and Improper Amount) (Re: Baljit Rai #33; Tom Truong #61; Paul Truong #64).
11/30/2011	290	Order Signed on 11/30/2011, Denying Motion of Aldo I. Perez for Reconsideration of Order Denying Motion to Appoint Examiner.
12/5/2011	293	Affidavit of Service of Eamon Mason - Order Denying Motion of Aldo I. Perez for Reconsideration of Order Denying Motion to Appoint Examiner. (related document(s)290) filed by Jeffrey S. Stein on behalf of The Garden City Group, Inc. (Stein, Jeffrey) (Entered: 12/05/2011)
12/27/2011	313	First Amended Plan [Joint] of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
12/27/2011	314	Amended Plan / Notice of First Amended Joint Chapter 11 Plan of the TSC Debtors
12/27/2011	315	First Amended Disclosure Statement for the First Amended Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
12/27/2011	316	Amended Disclosure Statement / Notice of First Amended Disclosure Statement for the Joint Chapter 11 Plan of the TSC Debtors
01/05/2012	321	Response - TSC Debtors' Reply to the Objections to the TSC Debtors' Proposed Disclosure Statement
01/10/2012	331	Statement /Notice of Filing Supplemental Objection of Aldo I. Perez to the TSC Debtors' Proposed Disclosure Statement

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
01/11/2012	336	Second Amended Plan [Joint] of the TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
01/12/2012	337	Second Amended Plan / Notice of Second Amended Joint Chapter 11 Plan of the TSC Debtors
01/12/2012	338	Second Amended Disclosure Statement for the Second Amended Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
01/12/2012	339	Second Amended Disclosure Statement / Notice of Second Amended Disclosure Statement of the TSC Debtors
01/17/2012	343	Order signed on 1/17/2012 Granting RE: (A) Approving the Disclosure Statement for the Joint Chapter 11 Plan of the TSC Debtors and (B) Establishing Solicitation and Voting Procedures with Respect to the Joint Chapter 11 Plan of the TSC Debtors
01/19/2012	365	Transcript regarding Hearing Held on 01/10/2012 10:07AM RE: Notice of Agenda of Matters Schedules for Hearing on January 10, 2012 at 10:00 a.m. (Prevailing Eastern Time); Disclosure Statement: Motion to Approve/Motion for Entry of an Order (A) Approving the Disclosure Statement for the Joint Chapter 11 Plan of the TSC Debtors and (B) Establishing Solicitation and Voting Procedures with Respect to the Joint Chapter 11 Plan of the TSC Debtors (related document(s)149); Motion for Objection to Claim(s) Number:58/TSC Debtors Objection to Claims of Elektrobit Inc.; Motion to Approve Case Management Order (as necessary) with Respect to Objections to Claim of Elektrobit Inc. (Claim No. 58).
01/20/2012	381	Letter Re: Opposing the Restructuring Terrestar Corporation Plans and all financials that does not include the common shareholders earned rights
02/15/2012	386	Objection of the Financial Disclosure
02/22/2012	396	Letter Re: Opposing the Restructuring Terrestar Corporation Plans and all financials that does not include the common shareholders earned rights

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
02/27/2012	403	Objection /Confirmation objection in response to the TSC debtors' 2nd amended plan of reorganization
03/08/2012	417	Objection /Claim Objections Response of Jeffrey M. Swarts
03/12/2012	419	Order signed on 3/12/2012 DENYING Re: Request for Examiner
03/26/2012	442	Memorandum Opinion And Order Denying Request For Stay Pending Appeal Signed On 3/26/2012
05/09/2012	478	Response to the Opinion and the Order Denying Request for Stay Pending Appeal
06/27/2012	513	Amended Chapter 11 Plan / Third Amended Joint Chapter 11 Plan of Terrestar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., Terrestar Holdings Inc. and Terrestar New York Inc.
06/27/2012	515	Amended Disclosure Statement / First Supplement to the Second Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of the TSC Debtors
06/28/2012	516	Motion to Approve / Motion for Entry of an Order: (A) Approving the First Supplement to the Second Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of the TSC Debtors; (B) Approving Related Notice and Objection Procedures; (C) Approving Amended Forms of Ballots for the Solicitation of Votes to Accept or Reject the Third Amended Plan; and (D) Scheduling Confirmation Hearing
06/25/2012	523	Letter filed by Aldo I. Perez. (Rodriguez, Maria) Additional attachment(s) added on 7/10/2012
08/01/2012	556	Letter with attached documents, dated 7/9/2012 Addressed to The Honorable Sean H. Lane
08/10/2012	564	Amended Disclosure Statement / First Amended Supplement to the Second Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of the TSC Debtors
08/10/2012	565	Statement / Notice of Filing Marked Version of the First Amended Supplement to the Second Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of the TSC Debtors

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
08/15/2012	569	Statement / Notice of Filing of Amended Exhibits to the Second Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of Terrestar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., Terrestar Holdings Inc. and Terrestar New York Inc.
08/24/2012	591	Order signed on 8/24/2012 Approving A) Approving the First Supplement to the Second Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of the TSC Debtors; (B) Approving Related Notice and Objection Procedures; (C) Approving Amended Forms of Ballots for the Solicitation of Votes to Accept or Reject the Third Amended Plan; and (D) Scheduling Confirmation Hearing
09/07/2012	607	Letter with attached documents, dated 8/16/2012 Addressed to The Honorable Sean H. Lane
09/20/2012	629	Statement of Elektrobic Inc. in Response to Submission by Aldo I. Perez
09/28/2012	638	Letter Re: Hearing held on August 23, 2012
10/01/2012	639	Letter Supplementing Objection To The Debtor's Third Amended Joint Chapter 11 Plan
10/05/2012	650	Memorandum of Law in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
10/09/2012	657	Statement Notice of Filing Exhibit A to TSC Debtors' Memorandum of Law in Support of Confirmation of the Third Amended Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., TerreStar Holdings Inc. and TerreStar New York Inc.
10/10/2012	660	Statement // Notice of Filing Document of Aldo I. Perez Related to Objection to the TSC Debtors' Joint Chapter 11 Plan
10/10/2012	661	Aldo Perez's Supplement To Objection to Debtor's Third Plan of Reorganization

Bankruptcy Case No. 11-10612 (SHL)		
Filing Date	Docket #	Docket Text
10/10/2012	664	Objection to the Memorandum of Law in Support of Confirmation of 3rd Amended Joint Chapter 11 Plan
10/24/2012	668	Findings of Fact, Conclusions of Law and Order signed on 10/24/2012 Confirming the Joint Chapter 11 Plan of Terrestar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., Terrestar Holdings Inc. and Terrestar New York Inc.
10/23/2012	675	Transcript regarding Hearing Held on 10/10/2012 4:08PM RE: Confirmation Hearing
03/11/2013	734	Statement // Notice of (A) The Occurrence of the Effective Date Under the Joint Chapter 11 Plan of Terrestar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc., Terrestar Holdings Inc. and Terrestar New York Inc.; (B) Administrative Claim Bar Date; and (C) Deadline for Professionals to File Final Fee Applications
04/17/2013	752	Memorandum Endorsed Order Signed On 4/11/2013. "DENIED" "The Court Treats This Letter As A Motion For Reconsideration And/Or To Vacate The Confirmation Order. The Court Denies The Request As Untimely And Not Satisfying The High Standard For Such Relief". Re: Letter To Judge Sean H. Lane Dated April 5, 2013, Filed By Aldo Ismael Perez. (Ebanks, Liza) Modified on 5/14/2013
04/17/2013	765	Memorandum Endorsed Order Signed On 4/11/2013. "DENIED" "The Court Treats This Letter As A Motion For Reconsideration And/Or To Vacate The Confirmation Order. The Court Denies The Request As Untimely And Not Satisfying The High Standard For Such Relief". Re: Letter To Judge Sean H. Lane Dated April 5, 2013, Filed By Aldo Ismael Perez

New York, New York
Dated: March 3, 2016

/s/ Joseph L. Sorkin

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